

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:16CR-258 CEJ (NAB)
)	
ALDEN DICKERMAN,)	
)	
Defendant.)	

GOVERNMENT’S MOTION TO SHOW CAUSE FOR SEALING OF RESPONSE

COMES NOW the United States of America, by and through Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Colleen C. Lang, Assistant United States Attorney for said District, and hereby shows cause why the Government’s Response to the Defendant’s Supplemental Pre-Trial Motions should be sealed.

The Government has requested sealing of both their responses to the defendant’s pre-trial motions to protect Exhibit One. Exhibit One to both responses is an article entitled, “Statistical Detection of Downloaders of Child Exploitation Materials in Freenet” (hereafter “the article”). This article is related to an ongoing investigation of child pornography offenses on “Freenet”¹ and how the law enforcement are investigating users of Freenet that are requesting child pornography on the network. The Government included the article as an exhibit because the article gives an accurate and complete picture of how Freenet works. Further, the article was written by three experts on Freenet, including Brian Levine, whom the Government intends to call at the evidentiary hearing. The investigation techniques discussed in the article are still being used on “Freenet” by law enforcement to detect Freenet users that are requesting files of

¹ “Freenet” is an online peer-to-peer file sharing network.

child pornography. The dissemination of law enforcement sensitive materials, including this article, could seriously jeopardize those continuing investigations. Due to this case being one of the first cases ever litigated on Freenet, the case has caught the attention of some prosecutors and defense attorneys around the country. The government is concerned about law enforcement sensitive techniques in the article being jeopardized if it is available to the public.

Therefore, the Government moved to seal their responses due to the law enforcement sensitive article being attached as an Exhibit. The Government will forthwith modify their sealing request so that it only applies to Exhibit One of their responses to pre-trial motions. The government's written response and other two exhibits, Exhibits Two and Three, can be made available to the public.

Respectfully submitted,

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Acting United States Attorney

/s/ Colleen C. Lang
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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Colleen C. Lang
COLLEEN C. LANG, 356872MO
Assistant United States Attorney